

JOINTLY SUBMITTED

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

CODY HOCKENHULL, individually

2:14-cv-1750-RFB-GWF

Plaintiff,

vs.

JACK SCHLUNEGER, JR., individually;
LANDFORCE CORPORATION, a
California Corporation, DOES I-X, and
ROE Corporations I-X, inclusive,

Defendants.

**STIPULATION TO EXTEND THE DATE FOR SUBMISSION OF THE JOINT PRE-
TRIAL ORDER AND TO SCHEDULE A SETTLEMENT CONFERENCE
(Second Requested Modification)**

Plaintiff Cody Hockenhull and Defendants Jack Schluneger, Jr. and Landforce Corporation, by and through their respective counsel, and pursuant to LR 26-4, stipulate to modify their discovery plan as follows:

(a) Discovery Completed.

All discovery is complete. The operative Stipulated Discovery and Scheduling Order (First Request) dated February 2, 2015 [ECF 15] provides as follows:

Last day of discovery: Closed June 22, 2015

Last day to amend/add: Closed March 23, 2015

Initial Expert Disclosure: Closed April 23, 2015

Rebuttal Expert Disclosure: Closed May 26, 2015

Dispositive Motions filed: Closed July 22, 2015

Joint Pre-Trial Order: August 21, 2015

**STIPULATION TO EXTEND THE DATE FOR SUBMISSION OF THE JOINT PRE-TRIAL ORDER AND
TO SCHEDULE A SETTLEMENT CONFERENCE (SECOND REQUESTED MODIFICATION)**

1 **(b) Discovery That Remains To Be Completed**

2 The only remaining item on the Scheduling Order that is incomplete is the
3 submission of the Joint Pre-Trial Order. The parties seek to extend that deadline in
4 order to have the court rule on Defendant's Motion to Exclude Evidence #1 [ECF 30]
5 and then subsequently participate in a settlement conference.
6

7 **(c) The Reason Why The Deadline Should Be Extended**

8 After discovery closed on June 22, 2015, Plaintiff Cody Hockenhull's doctor
9 drafted a report dated July 16, 2015 recommending future medical care that he opines
10 is related to the subject accident. On July 24, 2015, Plaintiff disclosed his future
11 damages claims to Defendants. On August 17, 2015, Defendants filed a Motion To
12 Exclude these damages claims, stating that they were untimely disclosed. [ECF 30].

13 Upon the filing of this motion, the parties met and conferred. They agreed to
14 participate in a Settlement Conference.

15 The parties agree that this Court should extend the deadline for filing the Joint
16 Pre-Trial Order until after this Court rules on the pending Motion to Exclude Evidence
17 [ECF 30] and until after the Settlement Conference has been completed.
18

19 **(d) A Proposed Schedule For Completing Remaining Tasks**

20 1. The parties hereby stipulate that the Discovery Plan and Scheduling Order
21 be modified a second time to extend the deadline for the Joint Pre-Trial Order.

22 2. The parties stipulate that the matter be submitted to a Settlement
23 Conference before the Magistrate Judge but not before the court has ruled on
24 Defendant's Motion to Exclude Evidence #1 [ECF 30].

25 3. The parties further agree that the due date of filing the Joint Pre-Trial
26 Order shall be extended until 30 days after the court has decided Defendant's Motion to

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1 Exclude Evidence #1 and the Settlement Conference has been held.

3 Dated: August 20, 2015

Dated: August 20, 2015

4 RICHARD HARRIS LAW FIRM

MILLS & ASSOCIATES

5 /s/ AJ Sharp

/s/ Michael C. Mills

7 RICHARD HARRIS, ESQ.

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Attorney for Defendants,

Las Vegas, NV 89101

Jack Schluneger, Jr., and

10 Attorney for Plaintiff,

Landforce Corporation

11 Cody Hockenhull

13 IT IS SO ORDERED this 25th day of August, 2015.

16 
UNITED STATES MAGISTRATE JUDGE

28 STIPULATION TO EXTEND THE DATE FOR SUBMISSION OF THE JOINT PRE-TRIAL ORDER AND
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